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9       **TERRENCE HARRIS**

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19       *Attorneys for Defendant,*  
20       **CREDIT ONE BANK, N.A.**

13  
14           **UNITED STATES DISTRICT COURT**  
15           **SOUTHERN DISTRICT OF CALIFORNIA**

16           TERRENCE HARRIS, an individual

17           Case No.: 3:16-cv-00908-DMS-DHB

18           Plaintiff,

19           **JOINT MOTION TO EXTEND**  
20           **TIME TO RESPOND TO INITIAL**  
21           **COMPLAINT**

22           v.  
23           CREDIT ONE BANK, N.A.,

24           Defendant.  
25  
26           Response due: May 16, 2016  
27           New response date: June 10, 2016

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29           **IT IS HEREBY STIPULATED BY AND BETWEEN** Plaintiff  
30       TERRENCE HARRIS (“Plaintiff”) and Defendant CREDIT ONE BANK, N.A.  
31       (“Defendant”), and through their respective counsel, as follows:  
32  
33

{Terrence Harris Joint Motion;1}

WHEREAS, the parties agree to extend the deadline for Defendant to respond to Plaintiff's Initial Complaint to June 10, 2016;

The parties enter into this Stipulation at Defendant's request because Defendant's counsel represents that they have only recently been retained, and who, due to the press of business, require additional time to respond to the allegations in the Complaint. The additional time is necessary to investigate the claims asserted in the Complaint.

That Defendant shall have an extension of time up to and including June 10, 2016 within which to respond to Plaintiff's Complaint.

## IT SO STIPULATED.

## **ANKCORN LAW FIRM, PC**

Dated: May 11, 2016

s/Mark Ankcorn

Mark Ankcorn

*Attorney for Plaintiff,  
TERRENCE HARRIS*

CARLSON & MESSEY LLP

Dated: May 11, 2016

s/ David J. Kaminski

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David J. Kaminski

Shawn Eldridge

*Attorneys for Defendant*

*CREDIT ONE BANK, N.A.*

# **SIGNATURE CERTIFICATION**

Pursuant to Section 2(f)(4) of the Electronic Case Filing Administrative Policies and Procedures Manual, I hereby certify that the content of this document is acceptable to Mark Ankcorn, counsel for Plaintiff, and that I have obtained his authorization to affix their electronic signatures to this document.

## CARLSON & MESSER LLP

Dated: May 11, 2016

s/ David J. Kaminski

David J. Kaminski

*Attorney for Defendant,  
CREDIT ONE BANK, N.A.*